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6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
8 **SAN FRANCISCO DIVISION**

9 THE DEPARTMENT OF FAIR EMPLOYMENT)
10 AND HOUSING,)
11 Plaintiff,)

12 v.)

No. CV 12-1830-EMC

13 LAW SCHOOL ADMISSION COUNCIL, INC.,)
14 Defendant.)

15 THE UNITED STATES OF AMERICA,)
16 Plaintiff-Intervenor,)

17 v.)

**SECOND AMENDED EXHIBITS
2(a) and 2(b) TO THE CONSENT
DECREE, INCLUDING
PERMANENT INJUNCTION¹**

18 LAW SCHOOL ADMISSION COUNCIL, INC.)
19 Defendant.)

20 ANDREW QUAN, NICHOLAS JONES, and)
21 ELIZABETH HENNESSEY-SEVERSON,)
22 Plaintiff-Intervenors,)

23 v.)
24)
25)

26 LAW SCHOOL ADMISSION COUNCIL, INC.)
27 Defendant.)

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¹ These amended exhibits are submitted jointly by all the parties to this action. Pursuant to Civ. LR 3-4(a), a complete list of the parties is contained on the signature page of this document.

Plaintiff Department of Fair Employment and Housing, Plaintiff-Intervenor the United States of America, Plaintiff-Intervenors Andrew Quan, Nicholas Jones, Elizabeth Hennessey-Severson, and Defendant Law School Admission Council, Inc. ("LSAC") (collectively "the Parties"), hereby respectfully submit the attached further amended Exhibits 2(a) and 2(b) to the Consent Decree, including permanent injunction, as requested by the Court on May 27, 2014. The parties agree that these exhibits replace the amended Exhibits 2(a) and 2(b) which were filed on May 23, 2014, at ECF 200.

DATED: May 27, 2014

Respectfully submitted,

**FOR THE CALIFORNIA
DEPARTMENT OF FAIR
EMPLOYMENT AND HOUSING:**

**FOR THE UNITED STATES
OF AMERICA:**

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HENNESSEY-SEVERSON:**

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² I, Melanie L. Proctor, hereby attest that I gained the concurrence of all signatories whose signatures are represented by /s/ in the filing of this document.

EXHIBIT 2(a)



NOTICE OF NATIONWIDE SETTLEMENT



**IF YOU APPLIED FOR TESTING ACCOMMODATIONS
FOR THE LAW SCHOOL ADMISSION TEST (LSAT)
YOU MAY BE ELIGIBLE FOR A MONETARY AWARD FROM A
\$6.73 MILLION NATIONWIDE COMPENSATION FUND**

The **Law School Admission Council (LSAC)** has entered into a Consent Decree with the **California Department of Fair Employment and Housing (DFEH)** to settle a statewide lawsuit and with the **U.S. Department of Justice (DOJ)** to settle a nationwide lawsuit. This resolution addresses alleged violations of the Americans with Disabilities Act (ADA) and the California Unruh Civil Rights Act, including LSAC's alleged failure to offer the LSAT in a manner accessible to individuals with disabilities.

If you applied for testing accommodations from LSAC between January 1, 2009 and May 20, 2014, you may be eligible to receive a payment from a \$6.73 million nationwide compensation fund.

TO BE ELIGIBLE FOR CONSIDERATION FOR PAYMENT, YOU MUST SUBMIT A CLAIM. THE DEADLINE TO SUBMIT A CLAIM HAS YET TO BE DETERMINED AND WILL BE POSTED HERE WITHIN FOUR MONTHS OF [INSERT DATE OF ENTRY OF CONSENT DECREE].

You may obtain information on how to submit a claim by:

1. Sending an e-mail with your name, address, and telephone number to [insert email address to be designated by Claims Administrator], or
2. Calling the Claims Administrator at [insert toll free voice and TTY telephone numbers to be designated by Claims Administrator].

Claimants who receive a payment from this fund must sign a release of any related claims against LSAC.

For more information or for a copy of the Consent Decree, visit www.dfeh.ca.gov or www.ada.gov.

EXHIBIT 2(b)



NOTICE OF NATIONWIDE SETTLEMENT

**IF YOU APPLIED FOR TESTING ACCOMMODATIONS
FOR THE LAW SCHOOL ADMISSION TEST (LSAT)
YOU MAY BE ELIGIBLE FOR A MONETARY AWARD FROM A
\$6.73 MILLION NATIONWIDE COMPENSATION FUND**

► DEADLINE TO RESPOND IS [INSERT DATE], 2014 ◀

The **Law School Admission Council (LSAC)** has entered into a Consent Decree with the **California Department of Fair Employment and Housing (DFEH)** to settle a statewide lawsuit and with the **U.S. Department of Justice (DOJ)** to settle a nationwide lawsuit. This resolution addresses alleged violations of the Americans with Disabilities Act (ADA) and the California Unruh Civil Rights Act, including LSAC's alleged failure to offer the LSAT in a manner accessible to individuals with disabilities.

If you applied for testing accommodations from LSAC between January 1, 2009 and May 20, 2014, you may be eligible to receive a payment from a \$6.73 million nationwide compensation fund.

TO BE ELIGIBLE FOR CONSIDERATION FOR PAYMENT, YOU MUST SUBMIT A CLAIM BY [INSERT DATE WHICH IS 180 DAYS AFTER DATE WHEN ALL NOTICE PACKAGES ARE SENT TO POTENTIAL ELIGIBLE PERSONS].

You may obtain information on how to submit a claim by:

1. Sending an e-mail with your name, address, and telephone number to [insert email address to be designated by Claims Administrator], or
2. Calling the Claims Administrator at [insert toll free voice and TTY telephone numbers to be designated by Claims Administrator].

Claimants who receive a payment from this fund must sign a release of any related claims against LSAC.

For more information or for a copy of the Consent Decree, visit www.dfeh.ca.gov or www.ada.gov.